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Attorney for Defendant/Debtor

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY --- NEWARK  
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In re:

David E. Solomon, Jr.

Chapter 7

Case No. 17-20263-VFP

Debtor

Hon. Vincent F. Papalia

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Lin Dan Lim & Scott Phillips,

PLAINTIFFS

ADV. PRO. NO. 17-1587

-against-

David E. Solomon, Jr.

DEFENDANT

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I, Nicholas Fitzgerald, the above named debtor's counsel,  
hereby certifies as follows:

1. I make this certification in support of the within motion  
to be relieved as the debtor's counsel in the above-entitled  
matters -- on both his underlying Chapter 7 case and on the  
adversary proceeding upon which the debtor's counsel has been  
defending the debtor.

2. There are two issues outstanding. In the underlying  
Chapter 7 case the debtor owes money to the Chapter 7 trustee. My  
associate and I have repeatedly asked the debtor to pay the trustee

but he has not done so. We cannot act as a collection agent on behalf of the trustee as that would put us in conflict with our client. The other outstanding issue is the adversary proceeding against the debtor. As it stands now, a trial date has been set for June 17, 2020.

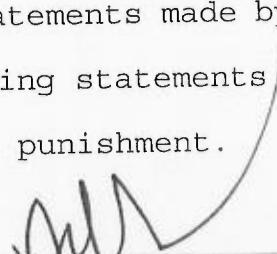
3. Although I cannot reveal the details, the debtor and I are at an impasse in regards to how to proceed in regards to the adversary proceeding and in regards to his underlying Chapter 7 case. The debtor is not following our advice.

4. Moreover, although I believe that the debtor has the funds on hand to pay my legal fees, the debtor has refused to do so.

5. The debtor is presently represented on another closely related matter by a different law firm. I know that the debtor has alternative counsel available because I have spoken with that counsel on the telephone. Alternative counsel is familiar with the many of the facts regarding the debtor's present situation and would be capable of quickly getting up to speed on this matter and of stepping in as trial counsel.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: March 11, 2020

  
Nicholas Fitzgerald  
Defendant/Debtor's Counsel